

MICHAEL N. FEUER, City Attorney, SBN 111529  
MARY CLARE MOLITOR, Chief, Criminal & Special Lit. Branch, SBN 82467  
JONATHAN CRISTALL, Superv. Assistant City Attorney, SBN 191935  
NANCY C. HAGAN, Deputy City Attorney, SBN 273981  
200 North Main Street, Room 966  
Los Angeles, California 90012  
Telephone: (213) 978-4090  
Fax: (213) 978-8717  
E-Mail: nancy.hagan@lacity.org

CONFORMED COPY  
ORIGINAL FILED  
Superior Court Of California  
County Of Los Angeles

MAR 06 2015

Sherri R. Carter, Executive Officer/Clerk  
By: Judi Lara, Deputy

Attorneys for Plaintiff

NO FEE – GOV'T CODE § 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

BC 5 74 7 2 1

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

CHERYL M. SUGASAWARA OYENOKI, an  
individual; CHRISTOPHER A. MENEFE, an  
individual; and DOES 1 through 50, inclusive,

Defendants.

Case No.:

**COMPLAINT FOR ABATEMENT  
AND INJUNCTION**

[HEALTH & SAFETY CODE  
SECTION 11570, *ET SEQ.* AND  
CIVIL CODE SECTION 3479, *ET*  
*SEQ.*]

[Unlimited Action]

PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

**I. INTRODUCTION**

1. This action ("Action") is brought and prosecuted by Plaintiff, the People of the State of California ("People"), for the purpose of abating, preventing, and enjoining a public nuisance that exists at a single-family home located at 12950 Admiral Avenue, Los Angeles, CA 90066 (the "Property"). The Action is brought pursuant to the Narcotics Abatement Law ("NAL") (California Health and Safety Code section 11570, *et seq.*) and the Public Nuisance Law ("PNL") (California Civil Code sections 3479-3480).

2. Set in a quiet neighborhood, the Property maintains a lawless and disorderly atmosphere in stark contrast to the neighboring homes. It is located within a half a mile radius

1 of Short Avenue Elementary School, Marina Del Rey Middle School, and Glen Alla Park (the  
2 "Park"), the latter of which is just three houses away from the Property. The Property is used,  
3 and is known by neighbors, to supply the narcotics dealers who sell drugs in the neighborhood,  
4 including at the Park. As such, the Property attracts individuals wanting to purchase, sell, and  
5 use narcotics to the neighborhood and generates a lawless environment from which the  
6 residents on and around Admiral Avenue suffer.

7 3. The Property has been owned by Defendant Cheryl M. Sugawara Oyenoki  
8 ("OYENOKI") since at least October 1, 1999. Plaintiff is informed and believes, and thereon  
9 alleges, that OYENOKI has resided at the Property with her boyfriend, Defendant Christopher  
10 Menefee ("MENEFE") since at least November 2014 (OYENOKI and MENEFE will  
11 hereinafter collectively be referred to as "Defendants"). Defendants are directly and/or  
12 indirectly permitting and facilitating drug sales and drug distribution at the Property, and  
13 creating a public nuisance that affects the entire community and neighborhood.

14 4. This Action arises from citizen complaints of narcotics and nuisance activities  
15 occurring at and around the Property. From an exact date unknown but since at least  
16 November 2014, the Los Angeles Police Department ("LAPD") began receiving community  
17 complaints concerning continuous narcotics and other unlawful activity occurring at the  
18 Property and its vicinity. The Property is reputed to be the site of narcotics sales, and at the  
19 time of this writing, the Property continues to attract individuals wanting to purchase narcotics  
20 for local distribution. Since just November 2014, there have been six arrests as a result of  
21 activity occurring at the Property. The growing nuisance and narcotics activity has not only  
22 significantly affected the quality of life and the quiet enjoyment of property by those who live  
23 near the Property, but it has also taxed scarce police resources by necessitating a  
24 disproportionate amount of LAPD attention.

[illegible][illegible]

3  
4  
5  
6  
7  
8  
9  
0  
1  
2  
3  
4  
5  
5  
7  
8  
9

[illegible]

9  
0  
1  
2  
3  
4  
5  
5  
7  
8  
9

---

\_\_\_\_\_

1 maintaining, and/or directly or indirectly permitting the nuisance complaints of herein. When  
2 the true names and capacities of said defendants have been ascertained, Plaintiff will seek  
3 leave of Court to amend this Complaint and to insert in lieu of such fictitious names the true  
4 names and capacities of said fictitiously named defendants.

5 9. Plaintiff is informed and believes, and thereon alleges, that at all times mentioned  
6 herein, Defendants OYENOKI, MENEFEE, and DOES 1 through 50 had knowledge of the  
7 nuisance and unlawful acts complained of herein, have wholly failed to abate the same, and  
8 have directly or indirectly maintained or permitted the nuisance described herein.

9 **C. The Property**

10 10. The Property is a single-family dwelling located at an address commonly known  
11 as 12950 Admiral Avenue, Los Angeles, California 90066. The Property's legal description is  
12 "Lot 17 in Block No. 'S' of Venice Del Rey, Tract No. 2, the City of Los Angeles, County of Los  
13 Angeles, State of California, as per map recorded in Book 8, page(s) 33 of maps, in the office  
14 of the County Recorder of said County," Assessor's Parcel Number 4223006017.

15 **III. THE NARCOTICS ABATEMENT LAW**

16 11. The abatement of a nuisance is a long established and well-recognized exercise  
17 of the state's police power. (*People v. Barbieri* (1917) 33 Cal.App. 770, 775; *People ex rel.*  
18 *Hicks v. Sarong Gals* (1974) 42 Cal.App.3d 556, 563.) Since its enactment in 1972, the  
19 principal purpose of the NAL (Health & Saf. Code, § 11570, *et seq.*) is the abatement of  
20 buildings and places "used for the purpose of unlawfully selling, serving, storing, keeping,  
21 manufacturing, or giving away any controlled substance, precursor, or analog specified in this  
22 division . . . ." (Health & Saf. Code, § 11570.)

23 12. The NAL provides that every building or place used for the purpose of unlawfully  
24 selling, serving, storing, keeping, manufacturing, or giving away any controlled substance,  
25 precursor, or analog, *inter alia*, "is a nuisance which **shall** be enjoined, abated, and prevented .  
26 . . whether it is a public or private nuisance." (Health & Saf. Code, § 11570 (emphasis added);  
27 *People ex rel Lungren v. Peron* (1997) 59 Cal.App.4th 1383, 1389; *Lew v. Superior Court*  
28 (1993) 20 Cal.App.4th 866, 870-871.)

1           13. Health and Safety Code section 11571 authorizes a city attorney to bring an  
2 action to abate, prevent and perpetually enjoin such nuisances. It provides in relevant part:  
3 "Whenever there is reason to believe that a nuisance as described in Section 11570 is kept,  
4 maintained, or exists in any county, the district attorney of the county, or the city attorney of  
5 any incorporated city or of any city and county, in the name of the people, may . . . maintain an  
6 action to abate and prevent the nuisance and perpetually to enjoin the person conducting or  
7 maintaining it, and the owner, lessee, or agent of the building or place in or upon which the  
8 nuisance exists from directly or indirectly maintaining or permitting the nuisance."

9           14. Health and Safety Code section 11573(a) provides that: "If the existence of the  
10 nuisance is shown in the action to the satisfaction of the court or judge, either by verified  
11 complaint or affidavit, the court or judge **shall** allow a temporary restraining order or injunction  
12 to abate and prevent the continuance or recurrence of the nuisance." (Emphasis added.)  
13 Further, Health and Safety Code section 11581 provides, as an additional remedy, for the  
14 removal and sale of all fixtures and movable property on the premises used in aiding or  
15 abetting the nuisance and for the closure of the building for up to one year.

#### 16                               IV. THE PUBLIC NUISANCE LAW

17           15. Civil Code section 3479 defines a public nuisance as "[a]nything which is  
18 injurious to health, including, but not limited to, the illegal sale of controlled substances, or is  
19 indecent or offensive to the senses, or an obstruction to the free use of property, so as to  
20 interfere with the comfortable enjoyment of life or property, or unlawfully obstructs the free  
21 passage or use, in the customary manner, of any . . . public park, square, street, or highway . .  
22 . ." (See *City of Bakersfield v. Miller* (1966) 64 Cal.2d 93, 99 ("The Legislature has defined in  
23 general terms the word 'nuisance' in Civil Code section 3479. . .").)

24           16. Civil Code section 3480 defines a public nuisance as "one which affects at the  
25 same time an entire community or neighborhood, or any considerable number of persons,  
26 although the extent of the annoyance or damage inflicted upon individuals may be unequal."

27           17. Civil Code section 3491 provides for the methods by which public nuisances  
28 such as those alleged herein may be abated. Civil Code section 3491 states that the

1 "remedies against a public nuisance are indictment or information, a civil action or abatement."  
2 Abatement is "accomplished by a court of equity by means of an injunction proper and suitable  
3 to the facts of each case." (*Sullivan v. Royer* (1887) 72 Cal. 248, 249; *see also People v.*  
4 *Selby Smelting and Lead Co.* (1912) 163 Cal.84, 90 ("[I]n California, the rule is well established  
5 that in proper cases injunctive relief which accomplishes the purposes of abatement without its  
6 harsh features is permissible.").)

7 18. Code of Civil Procedure section 731 authorizes a city attorney to bring an action  
8 to enjoin or abate a public nuisance. It provides in relevant part "[a] civil action may be brought  
9 in the name of the people of the State of California to abate a public nuisance . . . by the city  
10 attorney of any town or city in which such nuisance exists."

11 19. Where "a building or other property is so used as to make it a nuisance under the  
12 statute, the nuisance may be abated . . . , notwithstanding that the owner had no knowledge  
13 that it was used for the unlawful purpose constituting a nuisance." (*People ex rel. Bradford v.*  
14 *Barbiere* (1917) 33 Cal.App. 770, 779; *see also Sturges v. Charles L. Harney, Inc.* (1958) 165  
15 Cal.App.2d 306, 318 ("a nuisance and liability therefore may exist without negligence"); *People*  
16 *v. McCadden* (1920) 48 Cal.App. 790, 792 ("A judgment supported on findings that such  
17 nuisance was conducted and maintained on the premises in question, regardless of the  
18 knowledge of the owner thereof, is sufficient. Such knowledge on the part of the owner . . . is  
19 unnecessary."); *People v. Peterson* (1920) 45 Cal.App. 457, 460 ("[I]t was not necessary . . .  
20 for the trial court to find either, that the [defendants] threatened, and unless restrained, would  
21 continue to maintain, aid, and abet, the nuisance, or that they knew the building was used in  
22 violation of the act. . . . The existence of the nuisance was the ultimate fact in this case, and  
23 having been found, supports the judgment.").) This is because "the object of the act is not to  
24 punish; its purpose is to effect a reformation of the property itself." (*People v. Bayside Land*  
25 *Co.* (1920) 48 Cal.App. 257, 261.)

1                   **V.     FIRST CAUSE OF ACTION FOR NARCOTICS ABATEMENT**

2                               **[Health and Safety Code Section 11570, *et seq.* --**

3                               **Against All Defendants and DOES 1 through 50]**

4               20.     Plaintiff hereby incorporates by reference paragraphs 1 through 19 of this  
5 Complaint and makes them part of the First Cause of Action, as if fully set forth herein.

6               21.     The Property has been, from an exact date unknown but since at least November  
7 2014 and is currently being used for the purposes of unlawfully selling, serving, storing,  
8 keeping, manufacturing or giving away controlled substances in violation of Health and Safety  
9 Code section 11570, *et seq.* Specific examples of such activity include, but are not limited to,  
10 the following:

11               a.     On **November 4, 2014**, LAPD officers were conducting surveillance at the  
12 Park after receiving a complaint from a citizen – who wished to remain anonymous due to fear  
13 of retaliation – that an individual named Travis was selling narcotics at the Park and that his  
14 narcotics supplier lived nearby. During their surveillance, officers observed Terry Holcomb  
15 (“Holcomb”) walking around the Park, constantly looking around in all directions, and checking  
16 his cell phone multiple times. After meeting Travis Cortes (“Cortes”) at the Park, they walked  
17 together to the Property, entering the main house on the Property through the front door.  
18 Officers then observed multiple people exit the house and look down the street in both  
19 directions. Approximately fifteen minutes later, officers observed Cortes and Holcomb exit the  
20 front door of the Property, and walk back towards the Park. Officers detained and searched  
21 both individuals at the Park, recovering: three clear plastic baggies containing heroin and \$40  
22 from Cortes, and one clear plastic baggie containing methamphetamine from Holcomb. Cortes  
23 was arrested for possession of heroin for sales and Holcomb was arrested for possession of  
24 methamphetamine.

25               b.     On **November 10, 2014**, LAPD officers observed Frederick Dorton  
26 (“Dorton”) exiting a blue Ford Ranger truck parked in front of the Property and enter the  
27 Property through a side gate. Approximately thirty minutes later, officers observed Dorton and  
28 MENELEE exit the location and walk back to the truck. Dorton then placed an item into a tool

1 box located in the rear bed of the truck before driving away from the Property. After detaining  
2 Dorton several miles away from the Property, officers recovered: a clear zip lock bag  
3 containing methamphetamine and a smaller zip lock bag containing heroin inside a blue gym  
4 bag located behind the driver's seat; a clear, heat-sealed bag containing heroin and marijuana  
5 in the tool box in the bed of the truck; and \$645 on Dorton's person. Dorton was subsequently  
6 arrested for possession of heroin and methamphetamine for sales, and possession of  
7 marijuana. Officers then conducted a probation compliance search of MENEFEE at the  
8 Property. Upon approaching the Property, officers immediately observed three surveillance  
9 cameras posted at the location, which were likely being used as counter-surveillance for law  
10 enforcement. Officers were able to detain MENEFEE from the Property's garage, who  
11 directed them to heroin and methamphetamine located in the rafter of the garage. The  
12 packaging of both narcotics were consistent with the packaging found in Dorton's truck.  
13 Officers also recovered a Food Saver machine and a scale from the garage of the Property, as  
14 well as \$2,565 from MENEFEE's person. There were a total of five surveillance cameras from  
15 the Property, which officers also seized. MENEFEE was arrested for possession of heroin and  
16 methamphetamine for sales. OYENOKI was present inside the main house on the Property at  
17 the time of this incident.

18 c. On **February 8, 2015**, officers were conducting surveillance at the  
19 Property when they observed Dorton and MENEFEE exiting the side gate of the Property.  
20 Upon seeing officers, however, Dorton attempted to flee westbound on Admiral Avenue, while  
21 throwing a black leather pouch in front of the Property. After a short foot chase, officers were  
22 able to detain Dorton. Officers then searched the black leather pouch that Dorton attempted to  
23 discard and recovered sixteen individually wrapped plastic bindles of heroin, two bindles of  
24 methamphetamine, and thirty-two Alprazolam pills. Officers also conducted a search of the  
25 Property and recovered two surveillance cameras posted at the location as well as a clear  
26 plastic bindle containing methamphetamine located inside the Property's garage. Dorton and  
27 MENEFEE were both arrested. OYENOKI, who was present at the time of the incident,  
28 admitted to officers that she was aware MENEFEE was selling narcotics from the Property but



1 that he kept everything in the Property's garage.

2 22. Plaintiff is informed and believes, and thereon alleges, that Defendants  
3 OYENOKI, MENEFEE, and DOES 1 through 50 are responsible for conducting, maintaining,  
4 and/or directly or indirectly permitting the nuisance as alleged herein. Unless Defendants  
5 OYENOKI, MENEFEE, and DOES 1 through 50 are restrained and enjoined by order of this  
6 Court, they will continue to use, occupy and maintain, and/or to aid, abet or permit, directly or  
7 indirectly, the use, occupation and maintenance of the Property, together with the fixtures and  
8 appurtenances located therein, for the nuisance complained of herein, to the great and  
9 irreparable damage of the public and in violation of California law.

10 23. Plaintiff has no plain, speedy, or adequate remedy at law, and injunctive relief is  
11 expressly authorized in section 11570 – 11587 of the California Health and Safety Code.

12 **VII. SECOND CAUSE OF ACTION FOR PUBLIC NUISANCE**

13 **[Civil Code Section 3479, *et seq.* --**

14 **Against All Defendants and DOES 1 through 50]**

15 24. Plaintiff incorporates by reference Paragraphs 1 through 23 of this Complaint and  
16 makes them part of this Second Cause of Action as though fully set forth herein.

17 25. Since at least November 2014 through the present time, Defendants OYENOKI,  
18 MENEFEE, and DOES 1 through 50, have owned, operated, occupied, and/or used the  
19 Property, and/or directly or indirectly permitted the Property to be occupied and used in such a  
20 manner as to constitute a public nuisance in violation of Civil Code sections 3479 and 3480.  
21 The public nuisance, which exists up to the present time, consists of, but is not limited to, the  
22 illegal narcotics sales, storage, and/or distribution committed at and around the Property, as  
23 well as the disorderly presence of drug sellers, distributors, and buyers attracted by the  
24 Defendants and the Property. The public nuisance, as described herein, is injurious to health,  
25 indecent or offensive to the senses, and/or an obstruction to the free use of property, so as to  
26 substantially and unreasonably interfere with the comfortable enjoyment of life or property by  
27 those persons living in the surrounding community.

28 26. Defendants OYENOKI, MENEFEE, and DOES 1 through 50 have known or

1 should have known about the existence of the public nuisance complained of at the Property  
2 and have failed to abate the nuisance.

3 27. Defendants OYENOKI, MENEFEE, and DOES 1 through 50, in owning,  
4 conducting, maintaining, and/or permitting the use of the Property, directly or indirectly, as a  
5 public nuisance, have engaged in wrongful conduct and caused a serious threat to the general  
6 health, safety and welfare of the persons in the area surrounding the Property.

7 28. Unless Defendants OYENOKI, MENEFEE, and DOES 1 through 50, are  
8 restrained and enjoined by order of this Court, they will continue to use, occupy and maintain,  
9 and to aid, abet or permit, directly or indirectly, the use, occupation, and maintenance of the  
10 Property, together with the fixtures and appurtenances located therein, for the nuisance  
11 complained of herein, to the great and irreparable damage of Plaintiff and in violation of  
12 California law.

13 **PRAYER**

14 **WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND**  
15 **DECREE AS FOLLOWS:**

16 **AS TO THE FIRST CAUSE OF ACTION**

17 1. That Defendants OYENOKI, MENEFEE, and DOES 1 through 50, and the  
18 Property, including all the buildings and structures thereon, be declared in violation of  
19 California Health and Safety Code section 11570, *et seq.*

20 2. That the Property, together with the fixtures and moveable property therein and  
21 thereon, be found to constitute a public nuisance and be permanently abated as such in  
22 accordance with Section 11581 of the California Health and Safety Code.

23 3. That the Court grant a preliminary injunction, permanent injunction and order of  
24 abatement in accordance with Section 11570, *et seq.* of the California Health and Safety Code,  
25 enjoining and restraining Defendants OYENOKI, MENEFEE, and DOES 1 through 50, and  
26 their agents, officers, employees and anyone acting on their behalf, from owning, maintaining,  
27 operating, or occupying the Property for the purposes of unlawfully selling, serving, storing,  
28 keeping, manufacturing, or giving away controlled substances, and from permitting any

1 unlawful selling, storing, keeping, manufacturing, or giving away of controlled substances on  
2 the Property.

3 4. That the Court issue such orders in accordance with Health and Safety Code  
4 section 11573.5 to remedy the nuisance on the Property and enhance the abatement process,  
5 including without limitation physical and managerial improvements to the Property, restrictions  
6 on persons permitted to access the Property, and a 1,000 foot stay-away order from the  
7 Property for Defendant MENEFEE.

8 5. That as part of the Judgment, an Order of Abatement be issued, and that the  
9 Property be closed for a period of one year, not to be used for any purpose, and be under the  
10 control and custody of this Court for said period of time, or, in the alternative, if the Court  
11 deems such closure to be unduly harmful to the community, that Defendants pay an amount  
12 equal to the fair market rental value of the Property for one year to the City or County in whose  
13 jurisdiction the nuisance is located in accordance with Health and Safety Code section 11581  
14 subdivision (c)(1).

15 6. That each of the Defendants be assessed a civil penalty in an amount not to  
16 exceed twenty-five thousand dollars (\$25,000.00).

17 7. That all fixtures and moveable property used in conducting, maintaining, aiding or  
18 abetting the nuisance at the Property be removed by the LAPD and sold in the manner  
19 provided for the sale of chattels under execution. Said fixtures and property shall be  
20 inventoried and a list prepared and filed with this Court.

21 8. That there shall be excepted from said sale, such property to which title is  
22 established in some third party not a defendant, nor agent, officer, employee or servant of any  
23 defendant in this proceeding.

24 9. That the proceeds from said sale be deposited with this Court for payment of the  
25 fees and costs of sale. The proceeds of the sale of the moveable property shall be applied as  
26 follows: first, to the fees and costs of the removal and sale; second, to the allowances and  
27 costs of closing and keeping closed the Property; third, to the payment of the Plaintiff's costs in  
28

1 the Action; fourth, such other costs as the Court may deem proper, and; fifth, the balance, if  
2 any, to the owner of the Property.

3 10. That if the proceeds of the sale do not fully discharge all such costs, fees and  
4 allowances, the Property shall also be sold under execution issued upon the order of the Court  
5 or judge and the proceeds of such sale shall be applied in a like manner. That any excess  
6 monies remaining after payment of approved costs shall be delivered to the owner of said  
7 Property. Ownership shall be established to the satisfaction of this Court.

8 11. That Defendants and DOES 1 through 50, and any agents, trustees, officers,  
9 employees and anyone acting on their behalf, and their heirs and assignees, be perpetually  
10 enjoined from transferring, conveying, or encumbering any portion of the Property, for  
11 consideration or otherwise, without first obtaining the Court's prior approval.

12 12. That Defendants and DOES 1 through 50 be ordered to immediately notify any  
13 transferees, purchasers, commercial lessees, or other successors in interest to the subject  
14 Property of the existence and application of any temporary restraining order, preliminary  
15 injunction, or permanent injunction to all prospective transferees, purchasers, commercial  
16 lessees, or other successors in interest, *before* entering into any agreement to sell, lease or  
17 transfer the Property, for consideration or otherwise, all or any portion of the Property that is  
18 the subject of this Action.

19 13. That Defendants and DOES 1 through 50 be ordered to immediately provide a  
20 complete, legible copy of any temporary restraining order, and preliminary and permanent  
21 injunctions to all prospective transferees, purchasers, lessees, or other successors in interest  
22 to the Property, procure signatures acknowledging receipt of the aforementioned documents,  
23 and deliver a copy of such acknowledgment to the Los Angeles City Attorney's Office, c/o  
24 Deputy City Attorney Nancy C. Hagan or her designee.

25 14. That Plaintiff recover the costs of this action, including law enforcement  
26 investigative costs and any fees, including attorneys' fees, authorized by law, not to exceed  
27 \$1,000,000.00, from Defendants and DOES 1 through 50.

28 15. That Plaintiff recover the amount of the filing fees and the amount of the fee for

1 the service of process or notices which would have been paid but for Government Code  
2 section 6103.5. The fees may, at the Court's discretion, include the amount of the fees for  
3 certifying and preparing transcripts.

4 16. That pursuant to Health and Safety Code section 11575, this Action has  
5 precedence over all other actions, except criminal proceedings, election contests, hearing on  
6 injunctions, and action to forfeit vehicles under the narcotics abatement statutes.

7 17. That Plaintiff be granted such other and further relief as the Court deems just and  
8 proper.

9 AS TO THE SECOND CAUSE OF ACTION

10 1. That the Property, together with the fixtures and moveable property therein and  
11 thereon, be declared a public nuisance and be permanently abated as such in accordance with  
12 Civil Code section 3491.

13 2. That each of the Defendants, DOES 1 through 50, and their agents, officers,  
14 employees and anyone acting on their behalf, and their heirs and assignees, be preliminarily  
15 and perpetually enjoined from operating, conducting, using, occupying, or in any way  
16 permitting the use of the Property as a public nuisance.

17 3. That the Court grant a preliminary injunction, permanent injunction, order of  
18 abatement, and closure of the Property in accordance with California civil Code 3479, *et seq.*,  
19 enjoining and restraining Defendants, DOES 1 through 50, and their agents, officers,  
20 employees, and anyone acting on their behalf, from engaging in unlawful activity, including the  
21 unlawful selling, serving, storing, keeping, manufacturing, or giving away controlled substances  
22 on the Property.

23 4. That the Court issue such orders to remedy the nuisance on the Property and  
24 enhance the abatement process, including but not limited to, remedial improvements to the  
25 Property, restrictions on persons permitted to access the Property, and a 1,000 foot stay-away  
26 order from the Property for Defendant MENEFE.

27 5. Such costs as may occur in abating said nuisance at the Property and such other  
28 costs as the Court shall deem just and proper.

1           6.       That Plaintiff be granted such other and further relief as the Court deems just and  
2 proper, including closure and/or demolition of the Property.

3                               AS TO ALL CAUSES OF ACTION

4           1.       That Plaintiff recover the amount of the filing fees and the amount of the fee for  
5 the service of process or notices which would have been paid but for Government Code  
6 section 6103.5, designating it as such. The fees may, at the Court's discretion, include the  
7 amount of the fees for certifying and preparing transcripts.

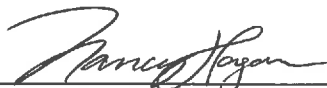
8           2.       That Plaintiff be granted such other and further relief as the Court deems just and  
9 proper.

10  
11 DATED: March 6, 2015

Respectfully submitted,

12           MICHAEL N. FEUER, City Attorney  
13           MARY CLARE MOLITOR, Chief, Crim. & Spec. Lit. Branch  
14           JONATHAN CRISTALL, Superv. Assist. City Attorney  
15           NANCY C. HAGAN, Deputy City Attorney

16 By: \_\_\_\_\_



NANCY C. HAGAN

Attorneys for Plaintiff, THE PEOPLE OF THE  
STATE OF CALIFORNIA